

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

LEONARD C. JEFFERSON,  
Plaintiff,

FILED

v.

'06 OCT 17 AM 11:35

C.A. NO. 04-44 ERIE

WILLIAM WOLFE, et al.,  
Defendants.

CLERK  
U.S. DISTRICT COURT

PLAINTIFF'S THIRD REQUEST FOR JUDICIAL NOTICE

NOW COMES plaintiff LEONARD C. JEFFERSON, and respectfully asks this Honorable Court to take Judicial Notice of the following, pursuant to Rule 201 of the Fed.R.Civ.P..

1. On October 15, 1999, the Supreme Court of Pennsylvania appointed the Committee on Racial and gender Bias in the Justice System to undertake a study of the state court system to determine whether racial or gender bias plays a role in the justice system.

2. During the early months of 2003 the above-mentioned Committee presented the FINAL REPORT OF THE PENNSYLVANIA SUPREME COURT COMMITTEE OF RACIAL AND GENDER BIAS IN THE JUSTICE SYSTEM (2003) (The REPORT).

3. As is indicated by (the enclosed) page 126 of The REPORT, the latest statistics available to the Committee indicate African-American's rate of incarceration in Pennsylvania is 18.4 times that of Whites.

4. As is indicated by (the enclosed) page 320 of The REPORT the Committee determined conditions are such in Allegheny County that African-American defendants routinely plead guilty to crimes which they did not commit, in a desperate and perverse attempt to secure a reduction of the level of the violation of Constitutional Rights that they know they must

endure.

5. A little constitutional violation is synonymous with being a little pregnant; actions of a court either violate the State and/or Federal Constitutions, or they do not, in the same way that one is either pregnant or one is not.

6. In the law there is no such thing as a little, or acceptable, violation of a constitution.

7. In light of the actual conditions faced by Plaintiff in: (1) the Allegheny County Court of Common Pleas, and (2) within the Pennsylvania Department of Corrections; the (enclosed) five (5) visual and three (3) verbal expressions are protected speech pursuant to the First Amendment.

8. Plaintiff's printed verbal and visual expressions would not pose a threat to the security of a correctional institution but would be extremely useful, if not essential, to effectively focusing the attention of public officials and private citizens on the unresolved violations of African-American's Constitutional Rights, which were perpetrated, and are being perpetuated, by the Court of Common Pleas of Allegheny County, Pennsylvania.

WHEREFORE Plaintiff respectfully asks this Honorable Court to take Judicial Notice of the foregoing facts.

Respectfully submitted

*Leonard C. Jefferson*  
Leonard C. Jefferson, CL-4135  
10745 Rt. 18  
Albion, PA 16475-0002

Dated: October 12 , 2006

Leonard C. Jefferson, CL-4135  
10745 Rt. 18  
Albion, PA 16475-0002  
October 12, 2006

Clerk's Office  
U.S. District Court  
P.O. Box 1820  
Erie, PA 16507

RE: JEFFERSON V. WOLFE, C.A. NO. 04-44 ERIE

Dear Clerk,

Would please file the enclosed Plaintiff's Third Request For Judicial Notice  
and Plaintiff's Objection To Defendants' Motion For Protective Order Concerning  
Plaintiff's 470 Requests For Admissions in the above-mentioned case.

Thank you for your attention to this matter.

Respectfully

*Leonard C. Jefferson*

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RE: JEFFERSON V. WOLFE, C.A. NO. 04-44 ERIE

Dear Clerk,

Would please file the enclosed Plaintiff's Third Request For Judicial Notice  
and Plaintiff's Objection To Defendants' Motion For Protective Order Concerning  
Plaintiff's 470 Requests For Admissions in the above-mentioned case.

Thank you for your attention to this matter.

Respectfully

*Leonard C. Jefferson*